

**Division Of Environmental Health  
Solid Waste Program  
410 Willoughby Avenue, Suite 105  
Juneau, Alaska 99801-1795  
<http://www.state.ak.us/dec/home.htm>**

**Telephone: (907) 465-5162  
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May 20, 2000

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Ronald Pflum,  
U.S. Army Corp of Engineers  
POB 898  
Anchorage, Alaska 99506

***RE: Solid Waste Permit # 9911-BA005***

Dear Mr. Pflum:

The Department of Environmental conservation has completed its evaluation of your inert waste disposal permit application dated January 13, 2000. This permit allows for the disposal over a three month period in the summer of 2000 of approximately 10,000 cubic yards of non-hazardous inert waste from the demolition of the Hoonah Radio Relay Station into a rock pit located approximately 200 yards to the east of the radio station facility about 1.5 miles northeast of the city of Hoonah, Alaska. The Department is issuing this permit in accordance with AS 46, 18 AAC 14, and 18 AAC 60. Please review the conditions and stipulations in the permit and ensure they are all understood. This permit is effective upon issuance and expires May 20, 2005.

Any person who disagrees with this decision may appeal by requesting an adjudicatory hearing, using the procedures contained in 18 AAC 15.200-310. Hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, 410 Willoughby Avenue, Juneau, Alaska 99801-1795, within 30 days of receipt of this letter. If a hearing is not requested within 30 days, the right to appeal is waived. Even if an adjudicatory hearing has been requested and granted, all permit conditions remain in full force and effect.

Sincerely,

Heather T. Stockard  
Solid Waste Program Manager

HTS/GM/sp (c:\z-dec\z-facil\hoonah\9911-BA005\9911-005.pmt)

Enclosure:      \*Permit #9911-BA005

**ALASKA DEPARTMENT  
OF  
ENVIRONMENTAL CONSERVATION  
DIVISION OF ENVIRONMENTAL HEALTH  
410 WILLOUGHBY AVENUE  
JUNEAU, ALASKA 99801**

**SOLID WASTE DISPOSAL PERMIT**

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U.S. Army Corp of Engineers  
Permit: **9911-BA005**

Page 1 of 11  
Date: May 20, 2000

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This Solid Waste Disposal Permit is issued to the U.S. Army Corp of Engineers, POB 898, Anchorage, Alaska 99506 for the disposal over a three month period in the summer of 2000 of approximately 10,000 cubic yards of non-hazardous inert waste from the demolition of the Hoonah Radio Relay Station into a rock pit located approximately 200 yards to the east of the radio station facility about 1.5 miles northeast of the city of Hoonah, Alaska. The site is more specifically located at section 21 and 22 in T.43N., R.61E., CRM. This permit is subject to the conditions and stipulations contained in the following Appendices:

Appendix A	Site Development & Operations .....	Page 3
Appendix B	Monitoring & Corrective Action .....	Page 5
Appendix C	Site Closure and Post-Closure Care .....	Page 8
Appendix D	General Permit Conditions .....	Page 9

This permit is issued under the provisions of Alaska Statute 46.03 and the Alaska Administrative Code, as amended or revised, and other applicable state laws and regulations.

This permit allows for disposal of waste to occur according to the drawings in the application submitted January 13, 2000. Disposal of waste outside those areas would be considered an expansion and would require a modification to the permit before additional waste could be placed.

Disposal of waste specified in appendix A, section III of this permit is prohibited and is considered a violation of Alaska Administrative Code. Other types of waste disposal may be requested by the permittee, but must be authorized by approval, permit modification or a permit amendment.

This permit requires the permittee to operate according to the information in the application which was submitted on January 13, 2000 and in this permit. The permittee shall prevent run-on water intrusion, conduct monthly visual monitoring during times when the facility is actively accepting waste and perform analysis on leachate in order to prove compliance with Alaska water quality standard if visual monitoring detects any leachate seepages leaving the site. The permittee is also required to apply six inches of compacted cover as needed to the waste to prevent windblow conditions and apply 24 inches of

compacted and graded cover to the waste when the facility has reached maximum vertical height or is no longer receiving waste. Furthermore, the permittee is required to make deed notations and conduct five years of post-closure care monitoring after the facility is closed.

The quality of the waste that is disposed at this facility shall not be hazardous as defined by 40 CFR 261 nor shall it contain Regulated Asbestos Containing Material (RACM)..

Groundwater monitoring is not required at this disposal facility. The risk of contamination of any potential aquifers below the landfill as a result of the proposed operation is expected to be low because of the type of waste to be disposed. However, the department may require groundwater monitoring if there is evidence of contamination.

The operation of your facility has been found to be consistent with the Alaska Coastal Management Program regulations. This permit is effective upon issuance and expires May 20, 2005. It may be terminated or modified in accordance with AS 46.03.120.

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Heather T. Stockard  
Solid Waste Program Manager

## **APPLICATION COMPLIANCE**

- I. This permit is based on the application for the landfill dated January 13, 2000 for the operation of the landfill. The permittee must comply with the designs and plans in those documents unless otherwise specified in this permit. Additional modifications may be requested but must be authorized by a permit amendment signed by the Solid Waste Program Manager before that modification is effective.

## **APPENDIX A - SITE DEVELOPMENT & OPERATIONS**

### **I. LANDFILL SITE DEVELOPMENT**

The permit holder shall:

- A. construct the landfill according to the plans in the permit application January 13, 2000. Future modifications to the plan must be authorized by approval, permit amendment or modification,
- B. ensure by constructing and maintaining diversion structures such as ditches or berms that surface water from outside the facility does not flow onto the facility and over, into, or through uncovered or covered solid wastes,
- C. erect and maintain a sign at the entrance to the site that lists items that may not be disposed of such as regulated asbestos containing material (RACM), acids, corrosives, solvents, oily wastes, explosives, radioactive wastes, other hazardous wastes, and/or raw garbage, and,
- D. ensure that all operations will accommodate the waste volume and are done in a manner that will facilitate landfill closure.

### **II. WASTE DISPOSAL OPERATION**

The permit holder shall:

- A. ensure the site is managed in such a way as to prevent the attraction of wildlife or domestic animals to the facility,
- B. ensure that all loads of waste transported to the landfill are covered during transport to reduce the potential for litter along the access road to the site,

- D. collect all windblown and littered refuse from the disposal site and along the access and entrance roads at least once each month during the operation of the landfill. Return litter to the active disposal area for burial,
- E. ensure waste is deposited only in approved locations according to plan submitted January 13, 2000,
- F. ensure the working face is kept as small as practical,
- G. control leachate and any surface water run-off from the site and ensure that it does not cause a violation of 18 AAC 70 water quality regulations,
- H. divert all surface run-on water from the disposal facility,
- I. ensure that solid wastes are not placed in water,
- J. ensure that solid waste is not washed away from the facility,
- K. compact and grade the wastes so that water will run off rather than pool and sink into the fill and to prevent sloughing and erosion,
- L. prohibit combustion of solid waste and burning at the facility and immediately extinguish any fires that occur,
- M. consolidate, compact and cover the waste area with a minimum of six inches of compacted soil as needed in order to windblown litter and control nuisances,
- O. begin surface water monitoring and take immediate corrective action to maintain water quality standard in off site waters if leachate and/or runoff appears to migrate beyond the facility boundary at any time during the operation of the facility or during the post-closure period (refer to appendix B monitoring requirements for further information), and,
- P. close the facility according to the closure plan in the application submitted January 13, 2000 and in appendix C of this permit when the wastes reach the final elevation or when waste will no longer be placed at the facility.

### III. PROHIBITIONS AND SPECIAL RESTRICTIONS

The permit holder shall:

- A. prohibit the disposal of radioactive material, explosives, oil, solvents, strong acids,

municipal waste, and other waste defined as hazardous under 18 AAC 60.020 and 40 CFR Part 261 at the facility,

- B. prohibit disposal of regulated asbestos containing material (RACM) at this site,
- D. prohibit disposal of lead-acid vehicle batteries at this site,
- E. prohibit the disposal of liquids at the site,
- F. prohibit disposal of contaminated soil which contains metals or other chemicals in concentrations which the Department determines poses an unacceptable risk to human health or the environment,
- I. prohibit open burning at the site.

## **APPENDIX B - MONITORING AND CORRECTIVE ACTION**

### **I. VISUAL, SURFACE WATER, AND GENERAL MONITORING AND REPORTING REQUIREMENTS**

The permit holder shall:

- A. ensure that at least one person who is familiar with the requirements of this permit, permit application, and with the applicable requirements of the state solid waste management regulations (18 AAC 60), conducts a visual inspection of the facility at least once per month during the active life of the site unless the site cannot be accessed during winter conditions. Any violation found during those inspections shall be reported to the permittee and the department, and appropriate corrective action taken. At a minimum, visual monitoring shall document:
  - 1. placement of waste such that the working face is as small as practicable,
  - 2. cover material is applied as needed to prevent fugitive ash dust emission and litter,
  - 3. operational cover material is applied 6 inches thick or thicker in order to ensure #2 above,
  - 4. signs of damage or potential damage to any component of the facility from settlement, ponding, leakage, erosion, frost action,
  - 5. observation of combustion, steam or fires at the site since last inspection,
  - 6. road to the site is accessible,
  - 7. litter control measures are in place,
  - 8. sign of leachate at the facility boundary,

9. status of diversion structures and ditches. Are they in good repair and diverting water effectively from entering the facility,
  10. evidence of stress to wildlife or vegetation
  11. observe for evidence of bears since the last inspection. If bears are present the department shall be notified immediately,
  12. violations of water quality standards, permit conditions and referenced permit application, and,
  13. unauthorized waste disposal.
- B. maintain a written record of all visual monitoring inspections and any corrective actions taken, and make those records available to the department upon request.

## II. SURFACE WATER MONITORING PROGRAM

- A. Should visual monitoring detect the release of leachate, the permittee shall contact the department within 30 days of discovery and immediately conduct surface water monitoring. Samples shall be taken no more than 50 feet from the toe of the landfill. A sample of water that is representative of natural background conditions shall be taken when ever surface water is sampled. Samples shall be analyzed for parameters selected by the department and the results shall be submitted to the department within 60 days of the time sample is taken. The department will determine the schedule at which further samples will be taken.
- B. Test procedures for analysis of water samples and leachate samples shall conform to methods cited in 18 AAC 70.020(c), or as such regulations may be amended. The permittee may substitute alternative methods of monitoring or analyses only upon receipt of prior written approval from the department.

## III. GENERAL MONITORING REQUIREMENTS

- A. The department will decrease or increase the visual monitoring or sampling frequency or parameters depending upon the results of analysis or change in operation.
- B. Records Retention. All records and information resulting from the monitoring activities required by this permit, including all records of analyses performed, calibration and maintenance of instruments, and recordings from continuous monitoring instrumentation, shall be retained in Alaska for observation by the department for three years after expiration of the permit. Upon request from the department, the permittee shall submit certified copies of such records.
- C. If a water quality exceedance or concern is detected based on the criteria established in the monitoring plan and Alaska Water Quality Standard the permittee shall:



1. determine the extent of contamination,
2. determine if migration of waste or leachate from the facility is the cause of the change in water quality,
3. estimate the potential for a violation of the water quality standards,
4. take corrective actions to prevent a violation of the water quality standards, and,
5. notify the department within seven days after detecting a violation of the applicable water quality standards.

IV. POST-CLOSURE CARE MONITORING

- A. The permittee shall perform visual monitoring once per year for at least 5 years after the completion of closure. Visual monitoring should monitor for settlement, ponding, erosion, leachate, sloughing, combustion in the waste, adequacy of cover, grades, run-on diversion and run-off control structural integrity and function and water quality in the off-site receiving environment. At the end of the period the owner or operator shall submit a report to the department that describes site conditions and summarizes the information collected during post-closure.

V. RECORD KEEPING REQUIREMENTS

- A. The permittee shall maintain a copy of the following records listed in Table A in the facility's operating record. The records shall be kept for a period of at least 5 years following the end of the post-closure care period. The records shall be made available to Department staff for review during facility inspections.

**Table A.**

<b>RECORD KEEPING REQUIREMENTS</b>	<b>REGULATION CITATION:</b>
Permit application and permit	18 AAC 60.235
Inspection records, training procedures, and notification procedures	18 AAC 60.235
Any demonstration, certification, finding, monitoring, testing, or analytical data required by 18 AAC 60.800 to 18 AAC 60.860	18 AAC 60.235

<b>RECORD KEEPING REQUIREMENTS</b>	<b>REGULATION CITATION:</b>
The operational plan	18 AAC 60.235
Any permit or record required under the Clean Water Act as that Act applies to leachate and stormwater discharges	18 AAC 60.235
Water monitoring records & any related corrective action records	18 AAC 60.810
Visual inspections and Records	18 AAC 60.800
Closure & post-closure monitoring	18 AAC 60.490

- B. Monitoring Records. The permittee shall maintain a record of all visual, chemical and physical monitoring, inspections and any corrective actions taken, and make those records available to the department upon request.

## **APPENDIX C - SITE CLOSURE AND POST-CLOSURE CARE**

### **I. CLOSURE REQUIREMENTS**

The permit holder shall:

- A. ensure that closure activities are conducted in accordance with the closure plan in the permit application dated January 13, 2000 or as otherwise specified in this permit,
- B. ensure that a final cover of compacted 2 feet the last six inches of which is capable of sustained revegetation is placed at all areas of the landfill that have reached final elevation or within 90 days of the last waste placement,
- C. ensure that the covered areas and drainage control structures are graded to promote and maintain surface water runoff, to prevent ponding and erosion, and to minimize the amount of water entering the solid waste.
- D. ensure upper slopes are graded and compacted at 2% and side slopes are graded and compacted at 3(H):1(V) in order to promote drainage without settlement, erosion and ponding,

- E. develop and implement a six inch vegetative cover layer for completed areas within the first growing season using plant species recommended by the Alaska Plant Material Center (907-745-4469),
- F. prepare and submit to the Department after closure of the facility, a survey as-built or record drawings which show the location, types, and volume of waste deposited at the facility,
- G. prepare and submit to the department for approval after the facility is permanently closed a notation that will be recorded with the relevant State Recorder's Office or some other instrument that is normally examined during a title search which informs future property owners of the following concerning the facility:
  - 1. the land was used as a monofil,
  - 2. the type of waste that was placed in the monofil,
  - 3. the geographical boundaries of the waste management areas; and,
  - 4. details of any final cover, cap, or other structure or devices installed as part of closure.
- H. file the survey as-built, other deed notation requirements as specified in 18 AAC 60.490(a) and record drawings of the area used as a landfill and the notation mentioned in Appendix C, Section 1(g) and 1(h) above with the appropriate land records office or some other instrument that is normally examined during a title search within 60 days after the entire facility has been permanently closed to land filling, and submit proof of such recording to this department.

## II. POST-CLOSURE CARE

- A. If post-closure monitoring indicates a structural change in or damage to the facility, or if a violation of a permit condition is observed, the owner or operator shall take action to correct the change, damage, or violation, to prevent the escape of waste or leachate, and to clean up any waste that was or may have been disposed of in an unauthorized manner.
- B. Complete additional surface restoration work if the Department determines that significant erosion, ponding, settlement, or lack of success with revegetation has occurred within five years of facility closure.
- C. Conduct post-closure care monitoring according to appendix B.4 of this permit.

## **APPENDIX D - GENERAL PERMIT CONDITIONS**

### **I. ACCESS AND INSPECTION**

The permittee shall allow the Commissioner or his/her representative access to the permitted facilities at reasonable times to conduct scheduled or unscheduled inspections or tests to determine compliance with this permit, State laws, and regulations.

### **II. INFORMATION ACCESS**

Except for information relating to confidential processes or methods of manufacture, all records and reports submitted in accordance with the terms of this permit shall be available for public inspection at the State of Alaska Department of Environmental Conservation, Juneau Office, 410 Willoughby Ave., Juneau, Alaska 99801.

### **III. CIVIL AND CRIMINAL LIABILITY**

Nothing in this permit shall relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond his control, including, but not limited to, accidents, equipment breakdowns, or labor disputes.

### **IV. AVAILABILITY**

The permittee shall post or maintain a copy of this permit available to the public at the disposal facility administrative offices.

### **V. ADVERSE IMPACT**

The permittee shall take all necessary means to minimize any adverse impacts to the receiving waters or lands resulting from noncompliance with any limitation specified in this permit, including any additional monitoring needed to determine the nature and impact of the noncomplying activity. The permittee shall cleanup and restore all areas adversely impacted by the noncompliance.

### **VI. CULTURAL OR PALEONTOLOGICAL RESOURCES**

Should cultural or paleontological resources be discovered as a result of this activity, work which would disturb such resources is to be stopped, and the State Historic Preservation Office, Division of Parks and Outdoor Recreation, Department of Natural Resources, is to be notified immediately (907-269-8721).

### **VII. APPLICATIONS FOR RENEWAL**

In accordance with 18 AAC 15.100(d), applications for renewal or amendment of this permit must be made no later than 30 days before the expiration date of the permit or the planned effective date of the amendment.

VIII. OTHER LEGAL OBLIGATIONS

The requirements, duties, and obligations set forth in this permit are in addition to any requirements, duties, or obligations contained in any other permit that the Alaska Department of Environmental Conservation or the U.S. Environmental Protection Agency has issued or may issue to the permittee. This permit does not relieve the permittee from the duty to obtain any and all necessary permits and to comply with the requirements contained in any such permit or with applicable state and federal laws and regulations. All activities conducted by the permittee pursuant to the terms of this permit and all plans implemented by the permittee pursuant to the terms of this permit shall comply with all applicable state and federal laws and regulations.

IX. POLLUTION PREVENTION

In order to prevent and minimize present and future pollution, when making management decisions that affect waste generation, the permittee shall consider the following order of priority options: waste source reduction; recycling of waste; waste treatment; and waste disposal.